

Sunethra Muralidhara, Esq.
Nevada State Bar No. 13549
MURALIDHARA LAW, LLC
954 Avenida Ponce De Leon
Suite 205 – PMB # 10674
San Juan, Puerto Rico, 00907
Phone: 309-830-6792
sm@muralidharalaw.com

Attorney for Dr. Maninder Herr

**UNITED STATES DISTRICT COURT
DISTRICT OF NEVADA**

United States of America,

Plaintiff,

v.

Dr. Maninder Herr,

Defendant.

Case No. 2:24-cv-01724-JCM-DJA

**Stipulation to Extend Time to Answer
or Otherwise Plead**

(Fourth Request)

Plaintiff, United States of America, by and through Acting United States Attorney, Sue Fahami, and Assistant United States Attorney, Reem Blaik; and Defendant Dr. Maninder Herr, by and through his counsel of record, Sunethra Muralidhara Esq., of Muralidhara Law, LLC, hereby stipulate and agree that the Defendant's deadline to answer or otherwise respond to Plaintiff's Complaint, currently due April 14, 2025, **should be extended 60 days until June 13, 2025**. This extension is sought for the following reasons:

1. A complaint was filed on or about September 16, 2024. ECF 1.
2. Counsel was retained by defendant on or about October 15, 2024. Counsel has been diligently reviewing case materials and getting up to speed on the current status of the case as well as conducting her own investigation. On October 18, 2024, counsel

1 accepted service of the Complaint and acknowledged the initial due date to Answer of
2 November 29, 2024.

3 3. A stipulation to extend time to answer or otherwise plead (first request) was filed on
4 November 27, 2024. ECF 5. It was granted by this Court. ECF 6. A stipulation to
5 extend time to answer or otherwise plead (second request) was filed on December 24,
6 2025. ECF 7. It was granted on December 30, 2024. ECF 8. A stipulation to extend
7 time to answer or otherwise plead (third request) was filed on February 2, 2025. ECF
8 13. It was granted on February 3, 2025. ECF 14.

9 4. The parties are still in process of good faith negotiations and require additional time to
10 discuss potential resolution short of litigation. The defense is also continuing to
11 investigate the alleged violations.

12 5. This request is not sought for purposes of delay and made in good faith. This is the
13 parties' fourth request for a continuance.

14 Dated: March 25, 2025.

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16 Muralidhara Law, LLC

Sue Fahami
Acting United States Attorney

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18 By: /s/ Sunethra Muralidhara
19 Sunethra Muralidhara, Esq.
20 Counsel for Defendant Herr

By: /s/ Reem Blaik
Reem Blaik
Assistant United States Attorney

21 **IT IS SO ORDERED. No further extensions will be granted barring exceptional**
22 **circumstances.**

23 

24 **United States Magistrate Judge**

25 **Dated: 3/27/2025**
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